



MEMORANDUM

145334

DATE: August 25, 1989  
TO: Distribution List  
FROM: Paul E. Takacs *PT*  
SUBJECT: L163020000 -- St. Clair  
Sauget Sites (Area I, II) -- ~~Sauget~~  
SF -- Compliance/Enforcement

On August 21, 1989, representatives from IEPA and the Attorney General's Office met at Cerro Copper in Sauget. Discussions focused on Cerro reaction to the information request letter and on recent investigations performed by the Avendt Group at Creek Segment A and Site I.

Prior to this meeting, the State of Illinois and Cerro had discussed methods which would pressure other Sauget industries to join in negotiations led by Cerro. As a result, an information request letter was sent to area PRPs on August 7, 1989. IEPA has received only limited response from Sterling Steel for their involvement at Site 0 (treatment lagoons -- Area II). Our next course of action will be determined by the overall response generated by the information request. In addition, Cerro will be providing comments and proposals on this request by September 21.

Regarding the investigation performed on Creek Segment A and Site I, Raymond Avendt indicated that a phased approach will be taken toward a remedial investigation on Cerro-owned property. Investigations already performed on the creek segment have indicated extensive PCB contamination (5-700 ppm), most notably in the northern portion. The question as to whether the contamination results from the degradation of PCB waste or precursor product will be addressed when their report is finalized. Mr. Avendt indicated that substantial contamination existed to depths of 11 feet in some areas and that they evidently will be considering a removal action at Creek Segment A. Site I will be addressed in phase 2.

In reference to acceptable remedial options/alternatives as requested by Cerro's attorney, James Stewart, Cerro will be provided with location-specific ARARs. Site and chemical-specific ARARs will not be provided until Area I has gone through the COT and CROPA process pending submittal of an acceptable RI.

PT:jk/2938k,60

cc: Division File

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